

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	
Commission's Rules to Establish Rules)	
For Digital Low Power Television,)	MB Docket No. 03-185
Television Translator, and Television)	
Booster Stations and to Amend Rules for)	
Digital Class A Television Stations)	

To: The Commission

REPLY TO OPPOSITIONS

The National Translator Association ("NTA") filed a Petition for Reconsideration ("Petition") in the above-captioned proceeding, and National Public Radio ("NPR"), Cellular South, Inc. d/b/a C. Spire Wireless ("C Spire"), and CTIA ("CTIA") filed Oppositions to that Petition. NTA's Petition was directed to the short time frame (until December 31, 2011) allowed for television translator stations to vacate the 700 MHz band.

The opposing parties note that translator stations have been on notice that they must vacate the 700MHz band for at least 10 years. That is true. But the Commission had previously told translator operators that they could continue to operate in the out-of-core channels until the wireless industry actually needed the spectrum, and established a 120-day notice procedure [at Section 74.703(g) of the Commission's Rules] for any wireless licensee that actually needed spectrum to remove any potentially interfering translator station. That system has worked well.

The wireless industry has been slow to utilize the spectrum. NTA does not deny, however, that the wireless industry is entitled to use of the spectrum it bought and that translators must move. NTA does, however, ask for extension of the deadline--if only on a limited, case-by-case waiver basis--in order to protect television service to the public. One example of a circumstance warranting such a waiver would be a translator, which is the sole source of a given network's programming in the translator's rural service area, and the operation of which is dependent on public funds, lacks the resources timely to construct and operate on an authorized alternative channel, pending allocation of the necessary funds in the coming fiscal year. Other limited, but readily justifiable, circumstances exist, as well. When a translator station goes silent, members of the viewing public lose a television signal they have been receiving for years. The Commission is unwilling to cancel or modify the December 31 deadline. Accordingly, a policy of appropriate extension, by individual waiver of the deadline to clear the band, is fully justified and should be announced by public notice..

Respectfully submitted,

NATIONAL TRANSLATOR ASSOCIATION

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CERTIFICATE OF SERVICE

I, George R. Borsari, Jr., a partner in the law firm Borsari & Paxson, hereby
certify that copies of the foregoing Reply to Oppositions were this 9th day of December
2011 sent, via First Class United States mail, postage prepaid, to the following:

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